

Questions and Answers about Accessible Pedestrian Signals and Pushbuttons

WSDOT Highways and Local Programs

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Many local agencies in Washington State are converting from traditional to the countdown style pedestrian signal heads shown in the Manual on Uniform Traffic Control Devices. The countdown style tells sighted pedestrians how long they have to cross an intersection. This improves the signal's communication to these users. Title II of the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act requires that the signal be made accessible to pedestrians with vision disabilities.

Background

Q: Where can I learn background information about Title II of the Americans with Disabilities Act and Section 504 of the Rehabilitation Act and their application to the public right of way?

A: Please see the Federal Highway Administration's (FHWA) [Questions and Answers about ADA/Section 504](#).

Definitions

Q: What is an accessible pedestrian signal and pushbutton?

A: According to the 2009 Manual on Uniform Traffic Control Devices ([MUTCD](#)) and the Draft Public Rights-of-Way Accessibility Guidelines ([PROWAG](#)), an accessible pedestrian signal and pushbutton is an integrated system that communicates to pedestrians in a visual, audible, and vibrotactile manner about when to cross a street at a signalized intersection.

Q: What does APS stand for?

A: APS stands for an accessible pedestrian signal and pushbutton.

Q: What is the difference between an audible pedestrian signal and an accessible pedestrian signal and pushbutton?

A: The term audible pedestrian signal typically describes an older-style pedestrian signal that communicates the WALK phase using a series of audible cuckoos and chirps. While this type of pedestrian signal system was meant to communicate the WALK phase to pedestrians with no or low vision, it does not satisfy the current ADA and MUTCD requirements for accessible pedestrian signals and pushbuttons.

Requirements/Specifications for accessible pedestrian signals and pushbuttons

Q: When do we need to provide APS? Is APS needed when signal controllers or cabinets are upgraded?

A: FHWA requires that public entities with more than 50 employees and those that use federal funding follow Title II of the Americans with Disabilities Act and Section 504 of the Rehabilitation Act. Is an intersection being converted from traditional to countdown style pedestrian signal heads? Are signal controllers or cabinets being upgraded in order to convert from a traditional to a countdown pedestrian signal head now or in the future? Converting from a traditional to a countdown style improves the communication to sighted users. The intent of the ADA and the Rehabilitation Act are that communication is also improved for pedestrians who are blind or have low vision.

Currently, there is no standard as to how to apply these laws in the public right of way. The ADA Accessibility Guidelines (ADAAG) is directed at buildings and their on-site facilities, and do not explicitly address features within the public right-of-way. However, there is a requirement that “Each facility...shall be designed and constructed in such manner that the facility...is readily accessible to and usable by individuals with disabilities”.

Once finalized and adopted by the Department of Justice and the U.S. Department of Transportation, the Public Rights-of-Way Accessibility Guidelines (PROWAG) will be the standard for public right-of-way facilities. Until that time, FHWA requires State DOTs and local agencies to develop and follow a reasonable and consistent policy for addressing accessible pedestrian signals and pushbuttons (APS) in the public right of way. An APS policy is a plan and schedule that describes when their existing pedestrian signal systems will be upgraded to accessible pedestrian signals and pedestrian pushbuttons. This plan and schedule should be used in conjunction with the agency’s ADA transition plan if the agency’s Transition Plan does not currently address APS. The APS policy should also describe how the agency plans to respond to public requests for APS at specific locations.

FHWA considers the Draft Public Rights-of-Way Accessibility Guidelines (PROWAG) to be a reasonable policy. FHWA’s [Pedestrian Accessible Design Requirements](#) video recommends the use of either version of PROWAG, 2005 or 2011, in the absence of another standard. An agency can develop a written policy that simply states it is following the PROWAG on matters related to its public right-of-way facilities, or the agency can develop its own APS-specific policy. This can be a memorandum on official agency letterhead addressed to the public works/engineering department. Also, the APS policy is tied to your receipt of FHWA funds.

Q: By what date must accessible pedestrian signals and pushbuttons be installed?

A: Title II of the ADA applies to state and local public agencies. According to Title II, public entities with more than 50 employees, which includes part-time, seasonal, and contract staff, are required to develop an ADA transition plan within six months of January 26, 1992. They then must implement it and keep it updated to continue to address the community's needs. This includes public agencies with authority over streets, roads, or walkways. Please see question #10 of the Federal Highway Administration's (FHWA) [Questions and Answers about ADA/Section 504](#) for specific details about transition plans. In summary, the transition plan for these agencies must:

1. evaluate each service, program, and activity to identify and itemize/document specific architectural barriers, communication barriers, and discriminatory policies and practices that prevent individuals with disabilities from having access to and being able to fully use features of the public right of way. This is known as a self-evaluation.
2. describe the methods that the agency will use to make services, programs, and activities accessible.
3. provide a timeline to make services, programs, and activities accessible.
4. identify the official that is responsible for ensuring that the changes are made.

A best practice is to also include a cost estimate(s) for budgeting purposes. Agencies must make services, programs, and activities accessible unless the cost is unduly burdensome to the agency. Please see question #23 of FHWA's [Questions and Answers about ADA/Section 504](#) for more information.

As an agency begins to follow and keep their transition plan updated, they may need to construct or alter/modify a facility out of the order in the plan. Therefore, the facility must be made ADA compliant now, rather than waiting for the timeline in the transition plan. Also, if a member of the public makes a request for accommodation, the agency must provide accommodation now to the maximum extent feasible.

What standard should an agency use? Once finalized and adopted by the Department of Justice and the U.S. Department of Transportation, the Public Rights-of-Way Accessibility Guidelines (PROWAG) will be the standard for public right-of-way facilities. Until that time, FHWA requires State DOTs and local agencies to develop and follow a reasonable and consistent policy for addressing accessible pedestrian signals and pushbuttons (APS) in the public right of way. An APS policy is a plan and schedule that describes when their existing pedestrian signal systems will be upgraded to accessible pedestrian signals and pedestrian pushbuttons. This plan and schedule should be used in conjunction with the agency's ADA transition plan if the agency's Transition Plan does not currently address APS. The APS policy should also describe how the agency plans to respond to public requests for APS at specific locations.

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Q: What are the technical requirements/specifications for APS?

A: Pedestrian signals and pushbuttons are considered to be communication devices under the ADA. Please see the [MUTCD](#), as modified by [WAC 468-95](#), for the required features of an APS system. The following is a summary of the features:

1. Pushbutton locator tone.
2. Vibrotactile arrow on the pushbutton that indicates the crossing direction and the start of the WALK phase indication.
3. Audible WALK phase indication in the form of either:
 - Percussive tone if pushbutton stations are spaced 10 ft. or more apart.
 - Speech walk message if pushbutton stations are spaced less than 10 ft. apart.
4. Automatic volume adjustment for both the pushbutton locator tone and the walk phase indication to maintain a volume level above the ambient sound level.

The MUTCD recommends that pushbuttons be separated by a distance of at least 10 feet. Also, there are several optional features that may be incorporated into an APS system, including pushbutton pilot lights, tactile crosswalk maps, Braille, and extended pushbutton press options.

Q: Is an APS needed when the traffic signal is retimed to extend the pedestrian phase or cause it to happen sooner?

A: No.

Resulting Requirements for Curb and Sidewalk Upgrades

Q: Does converting to a pedestrian countdown signal or adding accessible pedestrian pushbuttons trigger curb ramp or sidewalk upgrades? If so, then where and when must the upgrades be made?

A: This depends. When accessible pushbuttons are installed, they must meet requirements for clear space and reach range. If this requires replacing, sawcutting, drilling, or otherwise disturbing the crosswalk, sidewalk, or ramp, you must upgrade these features so that they meet ADA requirements.

Only the pedestrian features disturbed by the construction must be replaced so that they meet ADA requirements. The ADA does not require you to look beyond the area of alteration. However, if your project paves (overlay or inlay—a chip seal is not considered to be an alteration) a marked or unmarked crosswalk, then you have altered the crosswalk. Therefore, you must upgrade the ramps and sidewalks on both sides of the crosswalk. However, [RCW 35.68.075](#) requires that any ramp that is constructed have a ramp on the other side of the crosswalk if curb and sidewalk exists.

All ADA retrofits triggered by an alteration to a pedestrian facility/element must be accomplished/completed at the same time as the project that triggered the retrofits. (Reference: *Kinney v. Yerusalim, 1993* as emphasized in question #19 of FHWA's [Questions and Answers about ADA/Section 504](#).)

Q: Do ADA ramp or sidewalk upgrades require that pedestrian countdown signals or accessible pedestrian pushbuttons be installed?

A: No, curb ramp or sidewalk retrofits by themselves do not trigger APS installation.

Q: Besides installing APS, our project will also infill/connect missing sections of sidewalk. Must the existing segments of sidewalk be modified if they do not meet width or cross slope provisions?

A: Yes, to the maximum extent feasible within the scope of the project. Agencies are not required to expand a planned scope of work to include other items of accessibility.

Q: What should we do if we cannot provide a level landing for the pushbutton or meet the reach requirement because of geometric, slope, or right of way constraints?

A: Under the ADA, cost is not to be used as a justification for installation to the maximum extent feasible. However, where constraints are present that do not make it technically feasible to install the pedestrian pushbutton to standards, the pushbutton can be installed to meet the requirements to the maximum extent feasible. In these cases, it is recommended that design documentation be kept that justifies the non-compliant elements of the design.

Technical infeasibility includes items like structural impacts, environmental impacts, unacceptable impacts to the community, or lack of right of way when right of way purchase is not a scoped element of the project.

Q: Can a local jurisdiction install truncated domes without upgrading a ramp that does not meet current ADA standards?

A: Installing a detectable warning surface (DWS) on a non-compliant curb ramp is an alteration of that curb ramp. Therefore, the curb ramp must be retrofitted to meet ADA

requirements. An exception is if an agency had an immediate emergency public request for a DWS from a constituent with a vision disability. Then it may be prudent to fulfill the customer request as soon as possible while scheduling retrofit of the entire curb ramp to occur as soon as possible.

For more information

Q: How can I get more information?

A: Please see FHWA's [Questions and Answers about ADA/Section 504](#) to learn more about Title II of the Americans with Disabilities Act and Section 504 of the Rehabilitation Act.

Q: Who at WSDOT can I contact for ADA questions?

A: For local agencies with projects partially or fully funded with state or federal funding through WSDOT Highways & Local Programs, please contact the [Regional Local Programs Engineer](#) assigned to the agency.

For agencies with other types of projects, feel free to contact the following:

- The [Regional Local Programs Engineer](#) assigned to the agency
- The [Community Design Assistance Team](#)
- The [WSDOT ADA Regional Coordinator](#)
- The [WSDOT Statewide Project Development/ADA Trainer](#)

Training

Q: How can I get training?

A: Please see our Local Technical Assistance Program training page for upcoming dates for our [Pedestrian Accommodation Workshop](#). For other training, please see Question #33 of FHWA's [Questions and Answers about ADA/Section 504](#).